

June 2008

Response to Review Comments

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Document Title:

Draft, Summary Report for Group IV Potential Release Locations, Environmental Baseline Survey, Former Marine Corps Air Station, El Toro, California, March 2008.

Reviewer: Mr. Anantaramam Peddada, Hazardous Substances Scientist, California Department of Toxic Substances Control, Office of Military Facilities, Southern California Operations Branch, Letter dated 30 April 2008.

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Comments			
1.		A cursory review of the PAH Reference-Level study, we find that there were a large number of non-detect samples for PAH in the investigation, indicating that anthropogenic PAH is not prevalent at El Toro. The report concludes (Section 4-1) "The calculated reference levels do not support the hypothesis that surface soils at MCAS El Toro have anthropogenic PAHs at or above the residential soil PRGs" DTSC is of the opinion that the reference levels are inappropriate for the current assessment of PRL 46.	<p>It is agreed that the PAH Reference-Level study indicated that anthropogenic levels of PAHs, <i>at or above the residential soil PRGs</i>, are not prevalent at El Toro. However, the study did identify anthropogenic background PAH concentrations exceeding the PRGs at specific sample locations. Subsequent samples indicated these concentrations were not widespread, but rather isolated or anomalous. This is further reflected in the results of the investigation performed at PRL 46. Most sampling results were either not reported or estimated at levels below the analytical reporting limits. No additional exceedences of the PRG were encountered.</p> <p>The cited reference level study for PAHs only provides complimentary information in the current assessment, but does not serve as a significant factor for recommending no further investigation at PRL 46. Multiple lines of evidence that consider the site history and the results of multiple investigations collectively support the recommendation for no further investigation at PRL 46. Section 5 of the Summary Report presents the basis for this recommendation.</p>
2.		The Navy should calculate potency equivalent factors (PEFs) for PAH following Table 8 of the document "Technical Support Document for Describing Available Cancer Potency Factors" OEHHA 2002 available on the Web at: http://www.oehha.org/air/hot_spots/pdf/TSD2002.pdf	The final report will include a benzo(a)pyrene equivalent calculation based on the PEFs provided in the updated Technical Support Document dated May 2005 (OEHHA 2005). The results of this calculation are provided as Table 4 in the Summary Report. This evaluation did not significantly affect the original risk screening analysis; therefore, the no further investigation recommendation for PRL 46 remains valid.

References:

Bechtel National, Inc. (BNI). 1996. *Final Report, Anthropogenic PAH Reference-Level Study, MCAS El Toro, California*. San Diego, California. July.Office of Environmental Health Hazard Assessment. 2005. *Technical Support Document for Describing Available Cancer Potency Factors*.
http://www.oehha.org/air/hot_spots/pdf/May2005Hotspots.pdf. May.